

GOLDSTEIN & RUSSELL, P.C.

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7475 Wisconsin Ave.  
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March 22, 2021

**VIA ECF**

The Honorable Alvin K. Hellerstein  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

The revised dates are acceptable. The conference scheduled for April 2, 2021, is hereby cancelled, pending the resolution of the open motion to dismiss.

So ordered,  
/s/ Alvin K. Hellerstein  
Alvin K. Hellerstein  
3/23/21

Re: *Brown, et al. v. National Bank of Pakistan*, No. 1:19-cv-11876-AKH (SDNY)

Dear Judge Hellerstein:

Pursuant to the Court's January 13, 2021 Order (ECF No. 34), NBP filed its Motion to Dismiss the Second Amended Complaint (ECF Nos. 39 & 40) on March 12, 2021. The Parties have agreed that Plaintiffs' response to that Motion will be due on April 16, 2021, and NBP's reply brief will be due on May 7, 2021. The Parties respectfully request that the Court endorse this agreed-upon briefing schedule.

The Parties also respectfully request that the Court adjourn the April 2, 2021 initial case management conference until after the Court has issued a decision on NBP's pending Motion to Dismiss. An adjournment would preserve judicial and party resources as the Court's decision on the Motion may affect any future schedule for the case. There have been no previous requests for rescheduling the initial case management conference.

Finally, the Parties have stipulated that the last date to serve Rule 26(a) Initial Disclosures, if such disclosures are required, will be 45 days following notice of this Court's ruling on NBP's pending Motion to Dismiss. All Parties reserve all rights, privileges, immunities, and defenses.

Respectfully submitted,

/s/ Tejinder Singh  
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/s/ Christopher M. Curran  
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Judge Hellerstein  
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